



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 29, 2013

Mr. Timothy Smith
Director of Facilities
Central Ohio Transit Authority
33 North High Street
Columbus, OH 43215

Mr. Rajib Sinha, P.E.
Shaw Environmental and Infrastructure Group
5050 Section Avenue
Cincinnati, OH 45212

Re: COTA Fields Avenue Derailment Subsurface Investigation Report
1333 Fields Avenue, Columbus, Ohio
Project ID # 125-003017-001

Dear Mr. Smith and Mr. Sinha:

The Ohio Environmental Protection Agency (EPA) received an electronic copy of the report titled *Derailment Subsurface Investigation* on January 11, 2013. The report presents the results of subsurface investigation activities following the discovery of four drums on property owned by the Central Ohio Transit Authority (COTA) during a recent and separate spill response action conducted by Norfolk Southern on COTA and Norfolk Southern's property. The January 11, 2013 report was prepared and submitted by Shaw Environmental on behalf of COTA. Shaw Environmental conducted the investigation in response to Ohio EPA's request to investigate the subsurface in the vicinity of the discovered drums to determine if additional drums or contamination from drums were present. The report also proposes cleanup activities based on the findings of the investigation.

On July 11, 2012, several cars of a Norfolk Southern train derailed on tracks adjacent to COTA's property (Incident #1207-25-1670). Norfolk Southern's contractor conducted cleanup activities in response to the spill. During the removal of a temporary access road on COTA's property on July 14, 2012, the contractor discovered four rusted steel drums and disposed of them along with soil and materials generated as part of the spill response. The drum discovery was reported as Incident #1207-25-1722.

As a follow up measure, COTA conducted an electromagnetic (EM) survey in the area where the drums were discovered. The EM survey detected an anomaly which indicated the potential presence of buried debris. Ohio EPA requested that COTA conduct a subsurface investigation in the drum discovery area to determine if additional drums or contamination were present.

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Shaw Environmental completed nine borings in the vicinity of the drum discovery area. Soil samples were collected for analysis for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals and polychlorinated biphenyls (PCBs).

VOCs, SVOCs and metals were detected in several of the samples. However, given their concentrations, industrial location and present limited accessibility, Ohio EPA is not requiring any action for these contaminants at this time. One soil sample collected from the 0 to 2 foot interval of Boring B-8 had a PCB (Aroclor 1248) concentration of 200 milligrams per kilogram (mg/kg).

In response to the PCB detection in Boring B-8, COTA proposes to excavate approximately 110 cubic yards of soil and any associated debris from the EM anomaly area centered on Boring B-8 and collect disposal characterization and PCB verification samples following the removal. The report states that the proposed sampling methodology will be reviewed by Ohio EPA.

Please note that remediation of PCB waste is regulated by the U.S. EPA, not Ohio EPA, under the Toxic Substances Control Act (TSCA). Therefore, Ohio EPA recommends that you contact Mr. Peter Ramanauskas of the U.S. EPA Region 5 Toxics Section at (312) 886-7890 or ramanauskas.peter@epa.gov for information regarding PCB remediation, sampling and disposal options under TSCA.

If you have any questions regarding this letter, please feel free to contact me at (614) 728-3833 or ray.moreno@epa.ohio.gov.

Sincerely,



Raymond R. Moreno
Site Coordinator
Division of Environmental Response and Revitalization
Central District Office

c: Stephan Douglas, Fields Avenue Facility Manager, COTA
 Marchelle Moore, Esq., COTA
 Marion White, CFO, COTA
 ✓ Peter Ramanauskas, U.S. EPA Region 5 Toxics Section

ec: Deborah Strayton, Ohio EPA DERR/CDO
 Leonard Powell, Ohio EPA DERR/CDO
 Chris Bonner, Ohio EPA DERR/CDO